

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JUAN ORLANDO PEREZ,

Case No.: 25-cv-777

Plaintiffs,

- against -

**FORD MOTOR
CREDITCOMPANY'S
NOTICE OF REMOVAL**

FORD MOTOR CREDIT COMPANY LLC
and EXPERIAN INFORMATION SOLUTIONS,
INC.,

Defendant.

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Ford Motor Credit Company LLC (“Ford Credit”), hereby removes the subject action from the Supreme Court of the State of New York, County of Kings, Index No: 501817/2025 to the United States District Court for the Eastern District of New York, on the following grounds:

THE PARTIES

1. Plaintiff Juan Orlando Perez (“Perez”) is a natural person who resides in Brooklyn New York.
2. Defendant Ford Motor Credit Company is a Delaware Corporation with its principle place of business in Dearborn, Michigan.
3. Upon information and belief Defendant Experian Information Solutions, Inc. is a corporation organized under the laws of the State of Ohio, with its principle place of business in Costa Mesa California.

NATURE OF CASE

4. On January 17, 2025, Perez commenced this action in Supreme Court of the State of New York, County of Kings, entitled *Juan Orlando Perez. Ford Motor Credit Company LLC, et al*, Docket Number 501817/2025. On January 22, 2025, Perez served Ford Credit with the Summons and Complaint. A true and correct copy of the Summons and Complaint are attached hereto as **Exhibit A**. No other process, pleadings, or orders have been served on Ford Credit.

5. Perez makes claims under and alleges Ford Credit violated the Fair Credit Reporting Act, 15 U.S.C §1681 et seq. (the “FCRA”). *See* Ex. A.

6. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. §1331 since there is a federal question. As alleged, this suit falls within the FCRA, which thus supplies this federal question.

7. Pursuant to 28 U.S.C. § 1441, et seq., this case may be removed from the Supreme Court of the State of New York, County of Kings to the United States District Court for the Eastern District of New York. This Court is the proper district court for removal because the State Court Action is pending within this district.

8. Removal is timely under 28 U.S.C. § 1446 because this Notice of Removal is filed within 30 days after Ford Credit’s receipt of a copy of the Summons and Complaint, filed in the Supreme Court of the State of New York, County of Kings.

9. Attached hereto as **Exhibit B** is a copy of Ford Credit’s Notice of Filing Notice of Removal to be filed in the Supreme Court of the State of New York, County of Kings, Docket Number 501817/2025.

11. Notice of this Removal will promptly be filed with the Supreme Court of the State of New York, County of Kings and served upon all parties.

WHEREFORE, Defendant Ford Credit, by counsel, removes the subject action from the Supreme Court of the State of New York, County of Kings to this United States District Court, Eastern District of New York.

Dated: New York, New York
February 11, 2025

Peter J. Fazio

BY: Peter J. Fazio, Esq. (PJF 1211)
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CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2025, I caused a copy of the foregoing Defendant Ford Motor Credit Company LLC's Notice of Removal to be electronically filed with the Clerk via CM/ECF.

Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system. Parties may access the filing through the Court's CM/ECF system.

Peter J. Fazio
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